DRAFT Statement of Basis - Narrative
NSR Permit

Type of Permit Action: Regular-New

Facility: Enterprise Field Services - South Eddy Cryo Plant
Company: Enterprise Products Operating LP - Environment Dept.
Permit No(s).: 5945
Tempo/IDEA ID No.: 34514 - PRN20140001
Permit Writer: Michael Space

Fee Tracking

Tracking	**NSR tracking entries completed:** [X] Yes [] No
	NSR tracking page attached to front cover of permit folder: [X] Yes [] No
	Paid Invoice Attached: [X] Yes [] No
	Balance Due Invoice Attached: [X] Yes [] No
	Invoice Comments: All fees paid by applicant

Permit Review	**Date to Enforcement:** TBD	**Inspector Reviewing:** Sondra Sage
	Date Enf. Review Completed: TBD	**Date of Reply:** (if necessary)
	Date to Applicant: TBD	**Date of Reply:**
	Date of Comments from EPA: TBD or N/A	**Date to EPA:** TBD or N/A
	Date to Supervisor: October 15, 2014	

1.0 **Plant Process Description:**

Enterprise Field Services LL (Enterprise) is proposing to construct South Eddy Gas Plant (South Eddy), a new 240 MMscf/day greenfield gas plant, in Eddy County, New Mexico. The facility will be approximately 17 miles southeast of Loving, NM. The South Eddy Gas Plant will be a Title V major source with emissions for NO_x, CO and VOC over 100 tons per year per pollutant. The facility will be a PSD minor source as none of the criteria pollutant emissions will exceed 250 tons per year. Accordingly, this application is being submitted under 20.2.72.200.A(1) NMAC. The facility will be an area source of HAPs, with HAPs emissions just under the 25 tpy (at 24.9 tpy) threshold.

Equipment at this facility will include three inlet compressors, powered by CAT G3612 engines (units E-1, E-2, and E-3); three residue compressors, driven by CAT 3616 engines (units E-4, E-5, and E-6); two refrigeration compressors, associated with the Centaur 40 turbines (units T-1 and T-2); two generators, powered by Mars 100 turbines (units G-1 and G-2); an amine unit (unit Amine-1) and associated triethylene glycol dehydrator (Dehy-1); a regeneration heater (unit H-1) for the mole sieve dehydrators; a heat medium heater (unit H-2); a thermal oxidizer (unit TO-1); and two flares (units FL-1 and FL-2). Other sources of emissions at the facility may include haul roads (unit HAUL); loadout emissions (unit LOAD); and facility-wide fugitives (unit FUG).

Startup, shutdown and maintenance (SSM) emissions are included in this application. SSM emissions include blowdown flaring; thermal oxidizer downtime flaring; blowdown venting; and startup/shutdown emissions associated with the turbines. For blowdown venting and flaring emissions, Enterprise is seeking a maximum hourly and annual volume, rather than permitting a specific number of events. For both of these scenarios, all potential gas compositions were considered to determine the maximum hourly and annual criteria pollutant emission rates.

NMED-AQB reviewed the emission calculations based on the manufacturer-provided emission factors. For most constituents, calculations were run based these emission factors. For HAPs, a spreadsheet was used to add up the applicant provided values, and spot-checked against what was provided in the individual table. Although the emissions appear reasonable, NO_x emissions approach the PSD threshold so a robust performance test period should be enforced. HAPs approach the major source threshold of 25 tpy.

The South Eddy Gas Plant will consist of one train. Field gas entering the facility will be sent through inlet separation design to remove entrained solids and dissolved liquids. The liquids will be sent to the condensate stabilizer, which will operate with heat from the heat medium heater (unit H-2). The vapors off of the stabilizer will be captured, recompressed by a vapor recovery unit (unit VRU-1) and routed back to the plant inlet, prior to inlet compression. The condensate will be sent to the pressurized condensate tanks; any gases will be recovered and routed into either the cryo process or to the inlet compression system. The stabilized condensate will be loaded onto pressurized trucks and removed from the facility.

After inlet separation, the field gas will be routed to the inlet compressors (units RC-1 through RC-3, driven by units E-1 through E-3) and then sent to the amine system (unit Amine-1 and Dehy-1) to remove carbon dioxide and water from the gas. Emissions from the amine flash tank and still vent will be routed to a thermal oxidizer (unit TO-1) to be incinerated. The rich amine will be regenerated through use of heat from the heat medium heater (unit H-2).

After the amine treating, the gas will be sent to the molecular sieve dehydrators (units Mole-1 through Mole-3) for the purpose of further removing water from the gas stream. Unit H-1 will be used to regenerate the sieves and may be assisted by heat from the heat medium heater (unit H-2). After dehydration, the gas will enter the cryogenic plant. Recovery of the natural gas liquids (NGLs) will be achieved by rapidly dropping the temperature. This will be accomplished through the use of an expander and propane refrigerant. The rapid temperature drop condenses out the heavier NGLs, while maintaining the methane in a gaseous form. The condensed liquid consists of NGL Y-Grade product that will be removed from the facility via pipeline. Units CC-1 and CC-2 are the refrigerant compressors, driven by units T-1 and T-2.

The dry, pipeline-quality residue gas (consisting primarily of methane) from the top of the demethanizer will be sent to the residue gas compressors (units RC-4 through RC-6, driven by units E-4 through E-6).

2.0 **Description of this Modification:**

This is a new NSR permit application.

3.0 Source Determination:

1. The emission sources evaluated include three inlet compressors, powered by CAT G3612 engines (units E-1, E-2, and E-3); three residue compressors, driven by CAT 3616 engines (units E-4, E-5, and E-6); two refrigeration compressors, associated with the Centaur 40 turbines (units T-1 and T-2); two generators, powered by Mars 100 turbines (units G-1 and G-2); an amine unit and TEG dehydrator (unit Amine-1 and Dehy-1); a regeneration heater (unit H-1) for the mole sieve dehydrators; a heat medium heater (unit H-2); a thermal oxidizer (unit TO-1); and flares (units FL-1 and FL-2). Other sources of emissions at the facility may include haul roads (unit HAUL); loadout emissions (unit LOAD); and facility-wide fugitives (unit FUG).

2. Single Source Analysis:

A. SIC Code: Do the facilities belong to the same industrial grouping (i.e., same two-digit SIC code grouping, or support activity)? **Yes**

B. Common Ownership or Control: Are the facilities under common ownership or control? **Yes**

C. Contiguous or Adjacent: Are the facilities located on one or more contiguous or adjacent properties? **Yes**

3. Is the source, as described in the application, the entire source for 20.2.70, 20.2.72, 20.2.73, or 20.2.74 NMAC applicability purposes? **Yes**

4.0 PSD Applicability:

This is a new proposed facility applying for an NSR Permit and all pollutants are PSD minor.

5.0 **History (In descending chronological order, showing NSR and TV):** *The asterisk denotes the current active NSR and Title V permits that have not been superseded.

Permit Number	Issue Date	Action Type	Description of Action (Changes)
* NSR Permit 5945	TBD	New NSR Permit	This facility is a proposed gas plant. See Section 1 for details.

6.0 **Public Response/Concerns:** NMED-AQB has received two letters of public interest as follows:

1. On July 31, NMED received a letter from Mr. Garth Grizzle. His cattle company maintains a permanent dwelling approximately 3.5 miles away from the proposed facility site. He is concerned about health effects from the facility. An initial citizen's letter was sent to him on August 25, 2014.
2. On September 24, 2014, an email was received from the US Department of Interior, National Park Service, with an attached letter signed by Susan Johnson. Their concern was plant-wide emissions' effects on Carlsbad Caverns National Park. Specifically, the applicant's emissions were near the PSD threshold for nitrogen oxides. The

application and updates have been provided to the land manager.

7.0 **Compliance Testing:**

This is a new facility. There is no testing history.

8.0 Startup and Shutdown:

A. If applicable, did the applicant indicate that a startup, shutdown, and emergency operational plan was developed in accordance with 20.2.70.300.D(5)(g) NMAC? No
B. If applicable, did the applicant indicate that a malfunction, startup, or shutdown operational plan was developed in accordance with 20.2.72.203.A.5 NMAC? Yes
C. Did the applicant indicate that a startup, shutdown, and scheduled maintenance plan was developed and implemented in accordance with 20.2.7.14.A and B NMAC? Yes
D. Were emissions from startup, shutdown, and scheduled maintenance operations calculated and included in the emission tables? Yes

9.0 **Compliance and Enforcement Status [Title V only]:**

N/A

10.0 **Modeling:**

As of October 21, 2014, the NMED-AQB Modeling Section had not completed their evaluation of the applicant's modeling analysis.

11.0 **State Regulatory Analysis(NMAC/AQCR):**

20 NMAC	Title	Applies (Y/N)	Unit(s) or Facility	Comments
2.1	GENERAL PROVISIONS	Yes	Entire Facility	The facility is subject to Title 20 Environmental Protection Chapter 2 Air Quality of the New Mexico Administrative Code so is subject to Part 1 General Provisions, Update to Section 116 of regulation for Significant figures & rounding. Applicable with no permitting requirements.
2.3	Ambient Air Quality Standards	Yes	Entire Facility	20.2.3 NMAC is a SIP approved regulation that limits the maximum allowable concentration of Total Suspended Particulates, Sulfur Compounds, Carbon Monoxide and Nitrogen Dioxide.

20 NMAC	Title	Applies (Y/N)	Unit(s) or Facility	Comments
2.7	Excess Emissions	Yes	Entire Facility	This regulation establishes requirements for the facility if operations at the facility result in any excess emissions. The owner or operator will operate the source at the facility having an excess emission, to the extent practicable, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions. The facility will also notify the NMED of any excess emission per 20.2.7.110 NMAC.
2.33	Gas Burning Equipment - Nitrogen Dioxide	No		This regulation applies to all gas burning equipment (external combustion emission sources, such as gas fired boilers and heaters) having a heat input greater than 1,000,000 million British Thermal Units per year per unit. The largest heaters at the facility are 727,080 million British Thermal Units per year per unit and are less than the 1,000,000 million British Thermal Units per year per unit applicability limit of this regulation. The facility is not subject to this regulation as it will not have emission sources that meet the applicability requirements under 20.2.33.108 NMAC.
2.34	Oil Burning Equipment - Nitrogen Dioxide	No		The proposed facility does not have oil burning equipment having a heat input of greater than 1,000,000 million British Thermal Units per year per unit. The facility is not subject to this regulation and does not have emission sources that meet the applicability requirements under 20.2.34.108 NMAC.
2.35	Natural Gas Processing Plant – Sulfur	Yes	Entire Facility	This regulation establishes sulfur emission standards for natural gas processing plants. The proposed facility meets the definition of a new natural gas processing plant under this regulation and is subject to the requirements of this regulation [20.2.35.7 (B) NMAC]. The facility will comply with all requirements under 20.2.35 NMAC as applicable.
2.37	Petroleum Processing Facilities	Yes	Entire Facility	This facility is subject to the requirements of 20.2.37.7.C NMAC for "New Natural Gas Processing Plants for which a modification commenced on or after July 1, 1974. This purpose of this regulation is to minimize emissions from petroleum or natural gas processing facilities. The proposed facility is considered a new petroleum processing facility under this regulation [20.2.37.7(C) NMAC]. The facility will comply with all applicable requirements under this regulation. NOTE: If this regulation applies then 20.2.61 NMAC does not apply.

20 NMAC	Title	Applies (Y/N)	Unit(s) or Facility	Comments
2.38	Hydrocarbon Storage Facilities	No		The proposed facility is not a tank battery or petroleum production facility as defined in this regulation [20.2.38.7 (D) and (E) NMAC]. The facility does not receive crude oil or condensate from a well. All gas and liquids enter the facility through a pipeline.
2.61	Smoke and Visible Emissions	No		This regulation establishes controls on smoke and visible emissions from certain sources. The facility is not subject to this regulation because 20.2.61.109 NMAC is superseded by 20.2.37 NMAC. [20.2.61.109 NMAC]
2.70	Operating Permits	Yes	Entire Facility	This regulation establishes requirements for obtaining an operating permit. The facility is a Title V major source. The facility has not been constructed or started operation. Once the facility commences operation, Enterprise will submit the initial Title V application within 12 months per 20.2.70.300.B(1) NMAC. PTE **is ≥** 100 TPY, Source is major for NOx, CO, and VOCs, as defined at 20.2.70.200 NMAC. It is an area source for HAPs (HAPs is **< 10 tpy single 25 tpy total)**
2.71	Operating Permit Fees	Yes	Entire Facility	Once the facility obtains a TV Permit, the source is subject to 20.2.70 NMAC as cited at 20.2.71.109 NMAC.
2.72	Construction Permits	Yes	Entire Facility	This regulation establishes the requirements for obtaining a construction permit. The facility is a stationary source that has potential emission rates greater than 10 pounds per hour and 25 tons per year of any regulated air contaminant for which there is a National or New Mexico Air Quality Standard. This regulation applies. NSR Permits are the applicable requirement, including 20.2.72 NMAC.
2.73	NOI & Emissions Inventory Requirements	Yes	Entire Facility	This regulation establishes emission inventory requirements. The facility meets the applicability requirements of 20.2.73.300 NMAC. The facility will meet all applicable reporting requirements under 20.2.73.300.B.1 NMAC.
2.74	Permits-Prevention of Significant Deterioration	No		This regulation establishes requirements for obtaining a prevention of significant deterioration permit. The facility does not have the potential to emit greater than 250 tons per year of any criteria pollutant and, therefore, is not subject to this regulation.
2.75	Construction Permit Fees	No		In accordance with 20.2.75.11.E an annual NSR enforcement and compliance fee shall not apply to sources subject to 20.2.71 NMAC. This facility is subject to 20.2.72 NMAC and is in turn subject to 20.2.75 NMAC for NSR permit application fees only.

20 NMAC	Title	Applies (Y/N)	Unit(s) or Facility	Comments
2.77	New Source Performance	Yes	E-1, E-2, E-3, E-4, E-5, E-6, RC-1, RC-2, RC-3, RC-4, RC-5, RC-6, T-1, T-2, G-1, G-2, H-2, Amine-1, Dehy-1 FUG	This is a stationary source subject to the requirements of 40 CFR Part 60, as amended through September 23, 2013. The proposed facility is subject to this regulation because 40 CFR Part 60 Subpart JJJJ (applies to all engines), Subpart KKKK (applies to all turbines), Subpart Dc (applies to unit H-2), and Subpart OOOO apply (applies to the amine unit, reciprocating compressors, fugitive leaks, and pneumatic devices).
2.78	Emissions Standards for HAPs	No		This regulation establishes state authority to implement emission standards for hazardous air pollutants subject to 40 CFR Part 61. This facility does not emit hazardous air pollutants which are subject to the requirements of 40 CFR Part 61 and is therefore not subject to this regulation.
2.79	Permits – Nonattainment Areas	No		This regulation establishes the requirements for obtaining a non-attainment area permit. The facility is not located in a non-attainment area and therefore is not subject to this regulation.
2.80	Stack Heights	Yes	Entire Facility	It applies to "all persons who own or operate a source or who intend to construct or modify a source" (20.2.80.2). Stacks must meet good engineering practice for dispersion of pollutants, without setting specific requirements.
2.82	MACT Standards for Source Categories of HAPs	Yes	E-1, E-2, E-3, E-4, E-5, E-6, and Dehy-1	This regulation applies to all sources emitting hazardous air pollutants, which are subject to the requirements of 40 CFR Part 63, as amended through August 29, 2013. This proposed facility is subject to this regulation because 40 CFR Part 63 Subparts HH and ZZZZ apply. Regulated equipment includes all heaters, RICE, and dehydrator.

12.0 Federal Regulatory Analysis:

Air Programs Subchapter C (40 CFR 50)	National Primary and Secondary Ambient Air Quality Standards	Applies (Y/N)	Unit(s) or Facility	Comments
C	Federal Ambient Air Quality Standards	Yes		Independent of permit applicability; applies to all sources of emissions for which there is a Federal Ambient Air Quality Standard.

NSPS Subpart (40 CFR 60)	Title	Applies (Y/N)	Unit(s) or Facility	Comments
A	General Provisions	Yes	E-1, E-2, E-3, E-4, E-5, E-6, RC-1, RC-2, RC-3, RC-4, RC-5, RC-6, T-1, T-2, G-1, G-2, H-1, H-2, Amine-1, Dehy-1, FUG	This regulation defines general provisions for relevant standards that have been set under this part. The facility is subject to this regulation because 40 CFR Part 60 Subpart JJJJ (applies to all engines), Subpart KKKK (applies to all turbines), Subpart Dc (applies to unit H-2), and Subpart OOOO apply (applies to the amine unit, reciprocating compressors, fugitive leaks, and pneumatic devices).
40 CFR 60.40Db, Subpart Db	Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units	No		60.40b(a) "The affected facility to which this subpart applies is each steam generating unit that commences construction, modification, or reconstruction after June 19, 1984, and that has a heat input capacity from fuels combusted in the steam generating unit of greater than 29 MW (100 million Btu/hour)." Units H-1 and H-2 are less than 100 MMBtu/hr.
40 CFR 60.40b, Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	Yes	H-2	This regulation establishes standards of performance for small industrial-commercial-institutional steam generating units. Unit H-2 will be installed or modified after June 9, 1989, with a heat input capacity greater than or equal to 10 MMbtu/hr but less than 100 MMbtu/hr. The unit will only burn natural gas and therefore will not be subject performance tests, reporting requirements, or emission limits under this regulation. The facility will follow all record keeping requirements for this unit. Unit H-1 is less than 10 MMBtu/hr and is therefore not subject to this regulation. The turbines at this facility are not subject to this requirement since they are subject to 40 CFR 60 Subpart KKKK. Affected facilities that are associated with stationary combustion turbines and meet the applicability requirements of Subpart KKKK of this part not subject to this subpart [40 CFR 60.40c(e)].
40 CFR 60, Subpart Ka	Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction,	No		This regulation does not apply because the facility doesn't have any storage vessels for petroleum liquids which were constructed, reconstructed, or modified after May 18, 1978

NSPS Subpart (40 CFR 60)	Title	Applies (Y/N)	Unit(s) or Facility	Comments
	Reconstruction, or Modification Commenced After May 18, 1978, and **Prior** to July 23, 1984			and prior to July 23, 1984.
40 CFR 60, Subpart Kb	Standards of Performance for Storage Vessels for Volatile Organic Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced **After** July 23, 1984	No		The pressurized condensate storage tanks at the proposed facility are exempt from this regulation per 40 CFR 60.110b(d)(2).
40 CFR 60.330 Subpart GG	Stationary Gas Turbines	No		This regulation establishes standards of performance for certain stationary gas turbines. South Eddy Gas Plant will have stationary gas turbines but they are exempt from this regulation as they are subject NSPS 40 CFR 60 Subpart KKKK [40 CFR 60.4305(b)].
40 CFR 60, Subpart KKK	Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants	No		This regulation defines standards of performance for equipment leaks of VOC emissions from onshore natural gas processing plants for which construction, reconstruction, or modification commenced after January 20, 1984, and on or before August 23, 2011. The facility will be constructed after August 23, 2011 and is therefore not subject to this regulation.
40 CFR Part 60 Subpart LLL	Standards of Performance for Onshore Natural Gas Processing: SO2 Emissions	No		This regulation establishes standards of performance for SO2 emissions from onshore natural gas processing for which construction, reconstruction, or modification of the amine sweetening unit commenced after January 20, 1984 and on or before August 23, 2011. The facility will be constructed after August 23, 2011 and is therefore not subject to this regulation.
40 CFR Part 60 Subpart IIII (Quad-I)	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines	No		The provisions of this subpart are applicable to manufacturers, owners, and operators of stationary compression ignition (CI) internal combustion engines (ICE) as specified in paragraphs (a)(1) through (3) of this section. This subpart does not apply because the facility has no stationary compression ignition internal combustion engines.
40 CFR Part 60 Subpart JJJJ (Quad -J)	Standards of Performance for Stationary Spark. Ignition Internal Combustion Engines	Yes	E-1, E-2, E-3, E-4, E-5, E-6	This regulation establishes standards of performance for stationary spark ignition combustion engines. The reciprocating engines at this facility are subject to the requirements of this subpart.

NSPS Subpart (40 CFR 60)	Title	Applies (Y/N)	Unit(s) or Facility	Comments
				All engines (E-1 through E-6) at the facility will be new 4-stroke lean burn engines with horsepower greater than 500 located at an area source of HAPs. Pursuant 60.4233(e), all engines are subject to NOx, CO, and VOC standards per NSPS JJJJ, Table 1. Compliance will be demonstrated consistent with 60.4243(b); Reporting and Recordkeeping will be consistent with 60.425.
40 CFR Part 60 Subpart KKKK	Standards of Performance for Stationary Combustion Turbines	Yes	T-1, T-2, G-1, G-2	This regulation establishes standards of performance for stationary combustion turbines. There are four turbines at this facility; all of which are subject to this regulation. Enterprise will operate and maintain the turbine units in a manner consistent with good air pollution control practices for minimizing emissions during startup, shutdown, and malfunction. NOx and SO2 emissions from turbines are regulated under this subpart. SO2 emissions will not be discharged from the turbines in excess of 110 nanograms per joule of gross output. For units G-1 and G-2 (> 50 MMBtu/hr), the following NOx emission standard will be met: • 25 ppm of NOx at 15% O2 or 150 ng NOx/J of useful output (1.2 lb/MWh) For Units T-1 and T-2 (≤ 50 MMBtu/hr), the following NOx emission standard will be met: • 100 ppm of NOx at 15% O2 or 690 ng/J of useful output (5.5 lb/MWh). Enterprise will conduct performance tests to demonstrate compliance per 40 CFR §60.4340(a), especially since test data were used instead of manufacturer's data.
NSPS 40 CFR Part 60 Subpart OOOO (Quad -O)	Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution	Yes	RC-1, RC-2, RC-3, RC-4, RC-5, RC-6, Amine-1, Dehy-1, FUG	This regulation establishes emission standards and compliance schedule for the control of volatile organic compounds (VOC) and sulfur dioxide (SO2) emissions from affected facilities that commence construction, modification or reconstruction after August 23, 2011. Since the facility will be constructed after August 23, 2011, pneumatic devices and equipment leaks are subject to this regulation. The amine unit is also subject to this regulation but only has recordkeeping requirements since it is designed to process less than 2 LT/D of sulfur. Lastly, the reciprocating compressors are subject to this regulation.

NSPS Subpart (40 CFR 60)	Title	Applies (Y/N)	Unit(s) or Facility	Comments
				The condensate tanks at the facility are pressurized and do not meet the definition of a storage vessel in this regulation. The pneumatic devices located at the facility will not be continuous bleed and therefore will not have applicable requirements under this regulation [40 CFR 60.5365(d)(2)]. The centrifugal compressors associated with the turbines at the facility are not subject this regulation because they utilize dry seals [40 CFR 60.5365(b)].
NSPS OOOO: The facility will be constructed after August 23, 2011, so all compressors, and all equipment addressed under equipment leak standards are subject to this regulation. Applicable to units-equipment: RC-1 to RC-6 and FUG (includes all equipment subject to equipment leak standards). Equipment leak standards (which cover a broad range of equipment) includes all equipment involved in a process unit, except the compressors. Equipment leaks apply to Unit FUG, and Unit FUG includes unnamed equipment such as piping, valves, flanges, connections, cryogenic equipment, but also includes named units Amine, Dehy, and process flare. 60.5365(f) identifies that a group of all equipment (except compressors) within a process unit is an affected facility and is covered by 60.5400 (equipment leak standards), 60.5401 (exceptions to equipment leak standards), 60.5402 (alternative emission limitations), 60.5421(notification, recordkeeping and reporting requirements) and 60.5422 (additional reporting requirements). Pursuant to 60.5365(f)(3), this equipment includes equipment associated with a compressor station, dehydration unit, sweetening unit, underground storage vessel, field gas gathering system or LNG unit (a cold plant and refrigeration unit would be part of the LNG unit). The facility will comply with this regulation upon startup. The reciprocating compressors must comply with §60.5385, 60.5410, 60.5415, and 60.5420. The Amine unit is subject to sulfur standards for processing at less than 2 L/T/day. It is subject to notification requirements in Subpart A and with the recordkeeping and reporting requirements specified below, but is not required to comply with §§60.5405 through 60.5407 and §§60.5410(g) and 60.5415(g); and recordkeeping to demonstrate exemptions found in 40 CFR 60.5365(g)(3) from standards, test methods, and monitoring in 60.5405 through 60.5407, 60.5410(g), and 60.5415(g); and reporting in 60.5423(b). Although not subject to NSPS OOOO, since FL-1 will be used as a control device, the flare will meet NSPS 60.18 to show compliance with 99% destruction efficiency per permittee application.				

NESHAP Subpart (40 CFR 61)	Title	Applies (Y/N)	Unit(s) or Facility	Comments
A	General Provisions	No		NSPS 40 CFR 61 does not apply to the facility because the facility does not emit or have the triggering substances on site and/or the facility is not involved in the triggering activity. The facility is not subject to this regulation. None of the subparts of Part 61 apply to the facility.

MACT Subpart (40 CFR 63)	Title	Applies (Y/N)	Unit(s) or Facility	Comments
A	General Provisions	Yes	E-1, E-2, E-3, E-4, E-5, E-6 and Dehy-1	Applies if any other subpart applies and Subparts HH and ZZZZ apply.
40 CFR 63.760 Subpart HH	Oil and Natural Gas Production Facilities –	Yes	Dehy-1	This regulation establishes national emission standards for hazardous air pollutants from oil and natural gas production facilities. The facility is an area source of HAPs and meets the definition of a natural gas processing plant. The dehydrator (Dehy-1) will have a natural gas flow rate equal to or greater than 85 thousand standard cubic feet. The dehydrator vents less than 0.90 megagrams of benzene per year to the atmosphere and is therefore exempt from the general standards of MACT HH per 63.764(e)(1)(ii). The facility is not subject to the equipment leak standards under this regulation since the facility is subject to equipment leak standards under NSPS OOOO which exempts them from the equipment leak standards under MACT HH.
40 CFR 63 Subpart ZZZZ (Quad Z)	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE MACT)	Yes	E-1, E-2, E-3, E-4, E-5, E-6	Facilities are subject to this subpart if they own or operate a stationary RICE, except if the stationary RICE is being tested at a stationary RICE test cell/stand. The reciprocating engines at this facility are subject to the requirements of this regulation. Pursuant to Section 63.6590(c)(1) for a new stationary RICE at an area source, Enterprise will comply with Subpart ZZZZ by complying with the applicable parts of Subpart JJJJ.

Miscellaneous	Title	Applies (Y/N)	Unit(s) or Facility	Comments
40 CFR 64	Compliance Assurance Monitoring	Yes	Amine-1 Dehy-1	This regulation defines compliance assurance monitoring. This regulation does apply to the amine and dehydrator units at this facility because the units have potential pre-control device emissions that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source. Enterprise will comply with all applicable requirements upon issuance of the Title V permit for this facility.
40 CFR 68	Chemical Accident Prevention	Yes	Entire Facility	The facility is an affected facility, as it will use flammable process chemicals such as propane at

Miscellaneous	Title	Applies (Y/N)	Unit(s) or Facility	Comments
				quantities greater than the thresholds. The facility will develop and maintain a RMP Plan for these chemicals.
Title VI – 40 CFR 82	Protection of Stratospheric Ozone – DOES NOT APPLY	No		This regulation establishes requirements for protection of the stratospheric ozone. The regulation is not applicable because the facility does not "service", "maintain" or "repair" class I or class II appliances nor "disposes" of the appliances [40 CFR Part 82.1(a)].

13.0 **Exempt and/or Insignificant Equipment that do not require monitoring**:

NSR Exempt Equipment

Description	JUSTIFICATION
Nitrogen Generator	Not a source of emissions
NGL Tanks – Pressurized tanks	20.2.72.202.B(5) NMAC
Condensate Tanks – Pressurized Tanks	20.2.72.202.B(5) NMAC
TK-A1 – Amine Make-Up Tank	20.2.72.202.B(5) NMAC
TK-A2 – Amine Make-Up Tank	20.2.72.202.B(5) NMAC
TK-M1 – Methanol Tank	20.2.72.202.B(5) NMAC
TK-M2 – Methanol Tank	20.2.72.202.B(5) NMAC
TK-O1 – Old Make-Up Tank	20.2.72.202.B(5) NMAC
TK-O2 – Old Make-Up Tank	20.2.72.202.B(5) NMAC
TK-S1 – Slop Tank	20.2.72.202.B(5) NMAC
TK-S2 – Slop Tank	20.2.72.202.B(5) NMAC
LOAD - Pressurized Condensate Loadout	20.2.72.202.B(5) NMAC
Mole-1 - Mole Sieve Dehydrator	20.2.72.202.B(5) NMAC
Mole-2 - Mole Sieve Dehydrator	20.2.72.202.B(5) NMAC
Mole-3 - Mole Sieve Dehydrator	20.2.72.202.B(5) NMAC
VRU-1 - Electric Vapor Recovery Unit	20.2.72.202.B(5) NMAC

14.0 **New/Modified/Unique Conditions** (Format: Condition#: Explanation):

All conditions contained within this permit are new as this is a proposed facility. The conditions contained herein follow standard Department format, style, wording, and monitoring protocols, and are consistent with other recently permitted natural gas processing facilities.

15.0 For Title V action: Cross Reference Table between NSR Permit 5945 and TV Permit NONE . NSR permit conditions cross referenced to the TV permit are federally enforceable conditions, and therefore brought forward into the TV permit: N/A not a TV Application.

16.0 **Permit specialist's notes to other NSR or Title V permitting staff concerning changes and updates to permit conditions.**

None